

**Lawton-Comanche County Civil Defense**

Comanche County Courthouse  
Room 107 — Box 9001  
Lawton, Oklahoma 73501  
(405) 355-0535

RECEIVED

MAY 24 1993

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

May 19, 1993

Attn: FCC Docket 92-235  
Federal Communications Commission  
1919 M. Street N.W.  
Washington, D.C. 20554

MAY 24 1993

FCC - MAIL ROOM

Dear Sirs,

It has come to my attention that the Federal Communications Commission (F.C.C.) is considering a rule change to limit frequency band width to 12 KHZ and that base stations would be reduced in power by 30 to 50 percent. Also mobile and portable radios would be allowed to spread only 4 KHZ in separation of the band width.

Comanche County, Oklahoma has just paid off the purchase of a complete radio system to include transmission tower and site, console, base stations, mobile and hand held radios at a cost of about \$250,000. We do all dispatching for police, fire and ambulance for all the communities in the County except the City of Lawton, Ok. When we put this new system in, we established the rural Volunteer Fire Departments. There are about 17 volunteer departments in the County.

If this new ruling takes effect, and we have to comply by 1996, here is what it would mean to us:

1. We would have to replace 12 base stations at \$6,000 to \$8,000 each.
2. Would have to replace all our antennas from omni to directional antennas.
3. Replace 200 mobile and hand held radios.
4. We would have to install at least two other tower sites to be able to cover our county. Estimated cost \$100,000 each.
5. The Volunteer Fire Departments would have to buy all new equipment, which they can't afford.
6. The small towns would have to do the same to replace their government frequency. This could break the city's budget.

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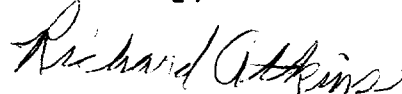
This rule change would have an adverse effect on Comanche County's budget as well as other counties and all small towns that are today just getting by. This is a situation driven by the manufacturer of the product. They get the change so they can sell more equipment. Also the Coordinating boards will get great revenue as all frequencies will have to be re-coordinated through them at about \$150.00 per frequency.

We strongly oppose this rule change and suggest other methods be considered to come up with frequencies. There is no equipment made to date that meets these new requirements. So we suggest, that once something is firmed up, that a phase in situation be looked at, two years is not long enough.

It is hoped that you will look at this change long and hard before you make a permanent change. Before you take the radios out of their hands, please think of all the entities and people who depend on radios to save lives.

Thank you for your consideration in this very important matter.

Sincerely,

A handwritten signature in cursive script that reads "Richard Atkins".

RA/hlk  
c.c. file

Richard Atkins  
Civil Defense Director

Senator David Boren  
Senator Don Nickles  
Congressman Dave McCurdy  
Comanche County Commissioners

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John Henry Ward, Executive Director

818 NW 63rd Street Oklahoma City, Oklahoma 73116-7604  
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**MEMORANDUM**

MAY 24 1993

**TO:** ALL BOARDS OF COUNTY COMMISSIONERS  
**FROM:** *RP* BOB PACKER, DEPUTY DIRECTOR  
**DATE:** MAY 3, 1993  
**SUBJECT:** 2 WAY RADIOS

FCC - MAIL ROOM

We have been advised that the Federal Communication Commission has proposed a rule that will have a detrimental and possibly disastrous effect on county government.

The new regulation would limit radio frequencies available for two-way communications, and limit the power of base stations. The National Association of County Engineers (NACE) advises that the regulation would require complete replacement of your radio systems by 1996.

You may wish to consult also with your sheriff as it will also affect his operation. You are encouraged to send your comments, with 12 copies, on this proposed rule **BEFORE** May 28, 1993 to:

ATTN: FCC Docket 92-235  
Federal Communications Commission  
1919 M. Street, N.W.  
Washington, D.C. 20554

This rule would take place in 1996 and would severely curtail the permissible power level of your transmissions, perhaps reducing range by as much as 30 to 50 percent. All new stations must have a bandwidth of 4 KHZ. According to NACE, base stations capable of operating within 4 KHZ of occupied bandwidth are not compatible with current radio equipment. Thus, again according to NACE, county road departments will either have to accept reduced coverages or replace all mobiles, portables and base stations prior to January 1, 1996 or ask for a waiver of the rules.

If you comment to FCC you might want to speak as to the enormous cost such replacement of equipment will entail and, that, according to NACE, the industry does not currently manufacture equipment capable of meeting the proposed regulations.